

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

PLAINTIFF

V.

CARLOS JAVIER RUIZ-PATIÑO

DEFENDANT

CRIMINAL NO.: 23-085(PAD)

MOTION FOR LEAVE TO TRAVEL

THE HONORABLE COURT:

COMES NOW, the Mr. Ruiz-Patiño through his undersigned attorney and very respectfully state and pray:

1. AUSA Olinhouse has informed the undersigned that as part of the discovery proceedings an airplane that was allegedly used by Mr. Ruiz-Patiño, as part of the case allegations, is available for inspection in an undisclosed location in Fort Lauderdale, Florida. The parties have arranged for such inspection to take place on July 24, 2023.

2. Accordingly, the undersigned seeks leave to purchase travel to Fort Lauderdale FL, to carry out the inspection and to incur a one-night hotel expense to be paid with CJA funds. Also a two day rental expense is requested.

WHEREFORE it is requested that this Honorable Court authorizes the undersigned to book travel to the State of Florida and a return flight to Puerto Rico during the aforementioned period with CJA funds and to authorize the undersigned to incur in travel expenses for one night lodging a two days of car rental fees.

HEREBY CERTIFY that on this same date, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of its filing to all counsel of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this July 12th, 2023.

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